

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI

Case No. 4:23-cv-00927-RLW

PREPARED FOOD PHOTOS, INC. f/k/a
ADLIFE MARKETING &
COMMUNICATIONS CO., INC.,

Plaintiff,

v.

KAYASAN, LLC d/b/a SHOGUN
FARMINGTON,

Defendant.

UNOPPOSED MOTION FOR EXTENSION OF TIME TO RESPOND TO COMPLAINT

Plaintiff Prepared Food Photos, Inc. f/k/a Adlife Marketing & Communications Co., Inc. (“Plaintiff”) respectfully moves the Court for an order extending the time for defendant Kayasan, LLC d/b/a Shogun Farmington (“Defendant”) to file its response to Plaintiff’s Complaint, and states as follows:

1. Plaintiff served its Complaint upon Defendant on August 11, 2023. Defendant’s response is due on September 1, 2023 [D.E. 6].
2. On August 21, 2023, undersigned counsel’s office was contacted by counsel for Defendant, Wenkai Tzeng, Esq., who indicated that he was recently retained and Defendant needs additional time to investigate the allegations of the Complaint.
3. Both Defendant and undersigned counsel for Plaintiff agreed to extend the deadline by 30 days to allow Defendant to investigate the allegations and properly respond.
4. The requested extension of time is being made in good faith and prior to the expiration date for Defendant’s response.

WHEREFORE, Plaintiff respectfully requests that the Court enter an Order granting Defendant an extension of time, through and including October 2, 2023,¹ to file its response to the Complaint.

Respectfully submitted,

Dated: August 22, 2023.

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By: /s/ Daniel DeSouza
Daniel DeSouza, Esq.

CERTIFICATE OF SERVICE

I hereby certify that on August 22, 2023, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF, which will electronically serve all counsel of record.

/s/ Daniel DeSouza
Daniel DeSouza, Esq.

¹ September 1, 2023 + 30 days is Sunday, October 1, 2023. As such, the deadline would be Monday, October 2, 2023.